

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA

PLAINTIFF

Vs.

Cause Number.: 1:12CR02 M-S

RYAN DANDRE HEARN

DEFENDANT

MOTION FOR EXTENSION OF TIME TO FILE
OBJECTIONS TO PRESENTENCE REPORT

COMES NOW the defendant, Ryan Dandre Hearn, by and through counsel and moves this Court for an extension of time to file his objections to the Presentence Report. In support thereof, the defendant would show unto this Honorable Court the following to wit:

1. The defendant's time for objections to the Presentence Report is set for February 21, 2013. His sentencing date is currently set for May 2, 2013.
2. After carefully reviewing the Presentence Report it appears that numerous objections will need to be filed.
3. Many of the needed objections are very fact specific, and a complete and thorough review of all of the discovery will be needed. The discovery contains many statements including some lengthy recorded interviews and telephone calls. Further, a suppression hearing was previously held during which the two victims testified. Their statements were not provided in discovery. Therefore, it will be necessary to have the motion hearing transcribed so that an accurate representation of their testimony can be made to the Court.
4. The defendant has already requested a transcript of that hearing. Once the same is provided, the Objections can be drafted and presented to the Court.
5. The undersigned respectfully requests that he be given additional time to file his objections to the Presentence Report.

WHEREFORE, PREMISES CONSIDERED, defendant, Ryan Dandre Hearn, respectfully requests this Court to grant him an additional time to file his objections to the Presentence Report.

Respectfully Submitted this the 19th day of February, 2013.

/s/ Robert W. Davis, Jr.

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CERTIFICATE OF SERVICE

I, Robert W. Davis, Jr., do hereby certify that I have this date placed in the United States Mail, postage prepaid, a true and correct copy of the above and foregoing Motion for Extension of Time to File Objections to Presentence Report to the following:

U. S. Probation Officer
911 Jackson Avenue
Oxford, MS 38655

Asst. United States Attorney
900 Jefferson Avenue
Oxford, MS 38655

This the 19th day of February, 2013.

/s/ Robert W. Davis, Jr.

Robert W. Davis, Jr.